## quinn emanuel trial lawyers | new york

51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100

WRITER'S DIRECT DIAL NO. (212) 849-7140

WRITER'S EMAIL ADDRESS marcgreenwald@quinnemanuel.com

November 18, 2020

## VIA ECF

Honorable Jesse M. Furman United States District Judge Southern District of New York 40 Foley Square New York, New York 10007 Application GRANTED. The Clerk of Court is directed to terminate Doc. #141. SO ORDERED.

November 18, 2020

Re: United States v. Ashu, 19 Cr. 318 (JMF)

Dear Judge Furman:

We are counsel to Defendant Cyril Ashu and write respectfully to request that the Court extend Mr. Ashu's bail for an additional period of 49 days, until Wednesday, January 20, 2021.

Since Mr. Ashu was released on April 2, 2020 with a surrender date of June 1, he has complied with all conditions and has been supervised without incident by the Pre-Trial Services agency in the Northern District of Georgia. Mr. Ashu previously requested and was granted four extensions of bail with the Government's consent. Dkts. 102, 109, 130, and 138-9. Mr. Ashu has found a job approved of by Pre-Trial Services, in accordance with the Court's order. Dkt. 109. Mr. Ashu is presently due to surrender on December 2. Dkts. 138-9.

Mr. Ashu was released "in light of the dire circumstances presented by COVID-19." Dkt. 90. COVID-19 continues to threaten New York City and its immediate environs, and interstate travel remains hazardous. We respectfully submit that the "compelling reasons" for Mr. Ashu's release have not changed and—on consent of the Government, with whom we have conferred—we request that the deadline for Mr. Ashu's surrender be extended by another 49 days, to January 20, 2021.

Respectfully,

/s/ Marc Greenwald

Marc Greenwald

cc: AUSAs Olga Zverovich and Jarrod Schaeffer (via ECF)